

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**SHAWN COREY CARTER,**

**Plaintiff,**

**vs.**

**ANTHONY BUZBEE, DAVID  
FORTNEY, ANTHONY G. BUZBEE LP  
(d/b/a THE BUZBEE LAW FIRM) and  
JANE DOE,**

**Defendants.**

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**Case No. 1:25-cv-00086-TFM-MU**

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**DEFENDANTS ANTHONY BUZBEE, DAVID FORTNEY, ANTHONY G.  
BUZBEE LP, AND JANE DOE’S UNOPPOSED/AGREED MOTION FOR EXTENSION  
OF TIME TO RESPOND TO SECOND AMENDED COMPLAINT**

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Defendants Anthony Buzbee, David Fortney, Anthony G. Buzbee LP, and Jane Doe (collectively, “Defendants”) move this Court for an extension of time through June 4, 2025 to respond to Plaintiff’s Second Amended Complaint.

As grounds for this motion, Defendants state that the Second Amended Complaint raises new allegations and issues that require additional time to address. Consequently, Defendants need more than the unusual 14 days to respond afforded by Rule 15.

Plaintiff does not oppose this request and is agreeable to these Defendants having until June 4, 2025 to file their response to the Second Amended Complaint. In exchange for Plaintiff’s agreement, Defendants have agreed to give Plaintiff until July 11, 2025 to file a response to any Rule 12(b) motion filed by these Defendants.

Respectfully submitted,

/s/ Matthew R. Jackson

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and Anthony G. Buzbee LP*

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/s/ J. Blair Newman, Jr. (with permission)

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 9th, 2025, I served a copy of the foregoing upon all counsel of record via this Court's CM/ECF System.

/s/ Matthew R. Jackson

OF COUNSEL